Fw: CO2 emissions from woody biomass

Ted Yackulic to: Alan Henning, Anthony Barber, Janis Hastings, Judith Lee, Kathleen Veit, Nancy Helm, Richard Parkin, Rick Albright, Running Grass, Paul Koprowski 10/02/2009 09:10 AM

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----- Forwarded by Ted Yackulic/R10/USEPA/US on 10/02/2009 09:08 AM -----

"Lisa Arkin" <larkin@oregontoxics .org>

10/02/2009 09:02 AM

Please respond to <larkin@oregontoxics.org>

To LisaP Jackson/DC/USEPA/US@EPA

cc Ted Yackulic/R10/USEPA/US@EPA, Running Grass/R10/USEPA/US@EPA

Subject CO2 emissions from woody biomass

Dear Administrator Jackson,

Oregon Toxics Alliance, Central Latino Americano and the Oregon Chapter of the American Lung Association filed a request for Alternative Dispute Resolution to the Environmental Justice Division of EPA Region 10. We remain extremely concerned about the public health impacts from the pollution and greenhouse gases that will be emitted from the proposed Seneca biomass plant to be located in Eugene, Oregon.

We understand that the US EPA is currently not accounting for CO2 and CO2 pre-cursor emissions from biomass burning in the regulatory process. This is a significant oversight. Greenhouse gases are determined to be air pollutants and also have a negative impact on the public health of communities in the near vicinity of biomass power plants.

We wish to submit these comments which describe the negative impacts of air pollutants and greenhouse gases on residents of West Eugene, Oregon if a proposed 18.8 MW co-generation biomass plant (Seneca Sawmill permit application submitted January 29, 2009) is approved as submitted. The community is demanding that maximum emissions control technology is required for construction, in this case, RSCR or Regenerative Selective Catalytic Reduction. If the permitting agency doesn't require RSCR, the biomass plant will be a major source of CO2 (according to their own consultants, 212,000 tons/year).

Biomass incineration, the process of burning wood for fuel, converts large amounts of carbon from a solid state to a gaseous state. Although biomass is viewed as being 'carbon neutral' by virtue of using biogenic carbon, biomass energy production can adversely affect atmospheric greenhouse-gas concentrations in important ways. The form in which carbon is transferred from the biomass stock to the atmospheric stock is critically important from the standpoint of greenhouse forcing impacts.

Burning woody biomass releases reduced carbon (methane or CH_4), which is twenty-five times more potent as a green house gas than oxidized carbon (CO_2) on an instantaneous, per-carbon basis. Maximum control technology (RSCR) will better control methane (CH_4) emissions and

reduce greenhouse gas effects.

In the process of converting carbon from a solid state to a gaseous state, biomass incineration directly affects the climate of surrounding neighborhoods, in that most of the gases produced are greenhouse gases or its pre-cursors. These gases trap pollution and infrared radiation.

Thus, biomass incineration will saturate the local climate of Eugene with greenhouse gases (CO_2, CH_4,), many other pollutants and particulate matter, with the most intense impacts to West Eugene neighborhoods. West Eugene has high concentration of low income, disabled and minority residents. This has the effect of creating a local micro-climate that leads to phenomena such as thermal inversions and acidic rain.

These phenomena will occur because, once continuous point-sources of greenhouse gasses are installed, their release rate may exceed the dispersion rate, creating a permanent accumulation of these gases in the atmosphere. This effect is compounded by the number and volume of point source polluters. The fact that Eugene sits at the bottom of the Willamette Valley and is surrounded by mountains disrupts the dispersion of gases and aggravates this micro-climate effect.

So, even if one accepts that the process is carbon neutral, a biomass plant has a significant potential for changing the quality of life for the communities nearby if maximum air emission equipment is not used. Oregon Toxics Alliance asserts that biomass energy plant poses a severe air pollution and public health hazard for nearby communities.

Thus, in order to maintain the quality of our local atmospheric conditions, it's necessary to reduce gaseous pollutant sources and control industrial gaseous outputs with maximum control technology. EPA's regulations must account for emissions from power plants that use biomass burning to generate electricity.

Sincerely,

Lisa Arkin

Executive Director, **Oregon Toxics Alliance**

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Please become a member of Oregon Toxics Alliance! You can support and strengthen our successful work to protect Oregon and create a future free from toxic harm.

Go to http://www.oregontoxics.org/join.html
Thank you very much!


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